

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NORTH DAKOTA  
SOUTHWESTERN DIVISION

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William P. Zuger,

Plaintiff,

COURT FILE NO.: \_\_\_\_\_

v.

Portfolio Recovery Associates, LLC,

Defendant.

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**NOTICE OF REMOVAL OF  
ACTION UNDER 28 U.S.C. § 1441(b)  
(FEDERAL QUESTION)**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendant Portfolio Recovery Associates, LLC ("PRA") hereby removes to this Court the state court action described below.

1. On or about June 5, 2012, the plaintiff commenced an action in the South Central Judicial District Court of Burleigh County, in the State of North Dakota. The action is entitled *William P. Zuger v. Portfolio Recovery Associates, LLC* and was identified as Case No. 08-2012-CV-\_\_\_\_\_. Upon information and belief, the case has not been filed. A copy of the summons and complaint is attached and marked as Exhibit "A".

2. This action is a civil action of which this Honorable Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by PRA pursuant to 28 U.S.C. § 1441(b) in that it presents a federal question under 15 U.S.C. § 1692 *et seq.*, the Fair Debt Collection Practices Act.

3. PRA received Plaintiff's summons and complaint on June 14, 2012 via a certified mailing to its registered service agent. This removal is timely.

4. To the best of the undersigned's knowledge, no pleadings or documents have been filed with the state court in this matter. Moreover, no documents other than Exhibit A have been received by PRA in this matter.

MOSS & BARNETT  
A Professional Association

Dated: July 5, 2012

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